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Comments on the NPRM "Security Programs of Foreign Air Carriers"

City Bird Headquarters
Dept. Ground Operations
Brussels April 1st, 1999

Comments to the FAA Administrator, Mrs. Jane Garvey

Dear Madam,

Allow us to thank you for the opportunity to submit comments on a.m. NPRM on behalf of our company. Before entering into detail we would like to stress that City Bird, a major Belgian airline, is as concerned as the FAA and the US Department of Transportation about the security of airline and airport operations.

The NPRM issued on November 13, 1998 outlines the proposed plan to have non-US airlines adapt identical security measures when operating to US territory.

We believe that our security measures, as required by Belgian law, are of identical quality as the one's you enforce of US carriers and see therefore no need to approve of your NPRM. Aside from this, we share the view held by ECAC that the proposed rule is also a clear violation of the Chicago Convention and ICAO's Annex 17, as it would be a violation of the sovereignty and territorial authority of ECAC Member States.

We therefore would like to support the position of the ECAC, and the Belgian CAA as a part of it, as demonstrated during the statement by Mr. Ryszard Zaremba, the Director General of Civil Aviation, Poland and ECAC Focal Point for Facilitation and Security Matters, which he delivered at the Public Hearing on the Hatch NPRM at Washington on 24 February, 1999.

Yours sincerely,

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